

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Ravidath Lawrence RAGBIR et al.,

Plaintiffs,

vs.

**THOMAS D. HOMAN, in his official capacity as
Deputy Director and Senior Official Performing
the Duties of the Director of U.S. Immigration
and Customs Enforcement, et al.,**

Defendants

Case No.: 18-cv-1159 (PKC)

DECLARATION OF REVEREND
MICAH BUCEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, I, MICAH BUCEY, declare under the penalty of perjury that the following is correct to the best of my knowledge:

1. My name is Micah Bucey. I am Minister at Judson Memorial Church, located at 55 Washington Square South in New York, New York.
2. On January 5, 2018, I and three other faith leaders attended a meeting with ICE Deputy Director Scott Mechkowski at 26 Federal Plaza. The purpose of the meeting was to discuss the case of Jean Montrevil, as well as unmarked vehicles parked outside Judson Memorial Church on January 3, 2018, which we believe may have belonged to ICE.
3. During the meeting, Mr. Mechkowski repeatedly complained about negative media portrayals of ICE. For example, he stated: "Nobody gets beat up in the news more than we do, every single day. It's all over the place, how we're Trump villains, how we're the Nazi squad, we have no compassion." Mr. Mechkowski also stated, "The other day Jean made some very harsh statements," and that he told Mr. Montrevil: "I'm like, 'Jean, from me to you...you don't want to make matters worse by saying things.'"

4. Without prompting, Mr. Mechkowski also mentioned Mr. Ragbir's activism, which had not been the subject of our conversation. Mr. Mechkowski stated: "We know you have city hall in your pocket. We get it." Mr. Mechkowski further stated: "I read something that Ravi wrote—'Do you think it's easy walking around with a target ...?'" Mr. Mechkowski stated: "We see him walking around the building with you all the time. And I've always said to myself, 'How can you say that when you are walking around the federal building, the very building where you know we are?'" He noted that what "bothers" him is "there isn't anybody in this entire building that doesn't . . . know about Ravi. Everybody knows this case. No matter where you go..."
5. Mr. Mechkowski denied that his officers surveilled Judson Memorial Church. Mr. Mechkowski stated: "If you think I would send people to Judson Church to arrest Ravi in front of the church you're absolutely crazy." When I asked Mr. Mechkowski to confirm that the cars around Judson Memorial Church were not ICE vehicles, Mr. Mechkowski confirmed: "Absolutely not." He further stated that Mr. Ragbir and Mr. Montrevil's cases were the two most high-profile cases that ICE had in New York City.
6. Mr. Mechkowski also affirmatively brought up Mr. Ragbir's then-upcoming check-in. He said he knew "Ravi's big thing has always been, I'm not gonna run from this." However, Mr. Mechkowski stated: "The check-in for Ravi this time isn't going to be like it was last time with people walking through here arm in arm." He also stated: "I am not going to have a Melissa Mark-Viverito running through my lobby videotaping this and talking about what an injustice this is and we're some kind of racists." Mr. Mechkowski further noted that he had not yet made a decision in Mr. Ragbir's case, and that nothing he told us was a lie and that the agency was not misleading us.

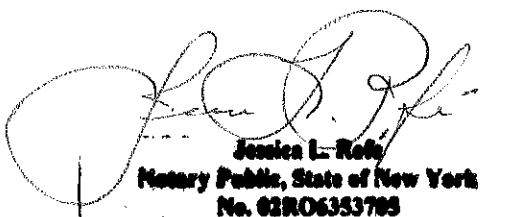
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: New York, NY
March 26, 2018

Respectfully submitted,



Rev. Micah Bucey



Jessica L. Reilly
Notary Public, State of New York
No. 02806353785
Qualified in Kings County
Certificate on File in New York County
Commission Expires January 30, 2021